

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Professional Fee Matters Concerning the
Jackson Walker Law Firm

Civil Action No. 4:23-CV-4787-AM

**DAVID DUNN, LIQUIDATION TRUSTEE'S
WITNESS AND EXHIBIT LIST FOR
HEARING ON MAY 22, 2025**

David Dunn (“Trustee”), Liquidation Trustee for the Basic Energy Liquidation Trust, files this witness and exhibit list (the “Witness and Exhibit List”) for the hearing scheduled for **May 22, 2025 at 9:00 a.m. (Prevailing Central Time)** before Chief Judge Alia Moses in Courtroom 8C of the United States Courthouse at 515 Rusk Street, Houston, Texas 77002 (the “Hearing”) and respectfully designates the following potential witnesses and exhibits.

WITNESSES

The Trustee may call and/or cross examine any of the following witnesses at the Hearing:

1. David Dunn, Liquidation Trustee of Basic Energy Liquidation Trust
2. Any witness called or listed by any other party; and
3. Any rebuttal witnesses.

EXHIBITS

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Date
1	Settlement Agreement and Release between Jackson Walker LLP and the Trustee				
2	Order Granting the Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Jackson Walker LLP as Counsel to the Debtors [Doc. No. 997 in Case No. 21-90002]				
3	Amended Combined Disclosure Statement and Joint Plan of Liquidation of Basic Energy Services, Inc. and Its Affiliated Debtors Pursuant to Chapter 11 of the Bankruptcy Code [Doc. No. 1421 in Case No. 21-90002]				
4	Order Confirming the Debtors' Combined Plan of Liquidation and Approving on a Final Basis the Disclosure Statement of Basic Energy Services, Inc., and its Affiliated Debtors Pursuant to Chapter 11 of the Bankruptcy Code [Doc. No. 1436 in Case No. 21-90002]				
5	Notice of (i) Entry of Confirmation Order, (ii) Occurrence of the Effective Date, and (iii) Related Bar Dates [Doc. No. 1454 in Case No. 21-90002]				
6	Final Order Allowing Compensation and Reimbursement of Expenses [Doc. No. 1511 in Case No. 21-90002]				
7	United States Trustee's Amended and Supplemental Motion for (1) Relief from Judgment Pursuant to Federal Rule of Civil Procedure 60(b)(6) and Federal Rule of Bankruptcy Procedure 9024 Approving the Retention and Compensation Applications of Jackson Walker LLP, (2) Sanctions, and (3) Related Relief [Doc No. 1791 in Case No. 21-90002]				

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Date
8	Joinder in United States Trustee's Motion for Relief from Judgment or Order Pursuant to Federal Rule of Civil Procedure 60(b)(6) and Federal Rule of Bankruptcy Procedure 9024 Approving Any Jackson Walker Applications for Compensation and Reimbursement of Expenses [Docket No. 1788 in Case No. 21-90002]				
9	Demand Letter to Jackson Walker LLP dated March 13, 2024				
10	Supplemental Demand Letter to Jackson Walker LLP dated January 23, 2025				
11	Jackson Walker LLP's Response in Opposition of the US Trustee's Amended Rule 60 Motion [Doc. No. 1834 in Case No. 21-90002]				
12	Summary of Bonds Ellis Eppich Schafer Jones LLP invoices				
13	Third Plan Supplement with Liquidation Trust Agreement attached as Exhibit A [Doc. No. 1423 in Case No. 21-90002]				
14	Notice of Standing and Indispensable Party [Doc. No. 1807 in Case No. 21-90002]				
15	Demonstrative Exhibit - Timeline				
	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases.				
	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party.				
	Any exhibit listed by any other party.				

The Trustee reserve the right to amend or supplement the Witness and Exhibit List at any time prior to the Hearing.

DATED: May 20, 2025

Respectfully submitted,

BONDS ELLIS EPPICH SCHAFFER JONES LLP

/s/ Aaron M. Guerrero

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**COUNSEL FOR DAVID DUNN,
THE LIQUIDATION TRUSTEE OF THE BASIC
ENERGY LIQUIDATION TRUST**

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2025 a true and correct copy of the foregoing was filed with the Court and served via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in this case.

/s/ Aaron M. Guerrero

Aaron M. Guerrero